



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

July 25, 2003

Mr. Michael Kellogg  
Pyxis Regulatory Consulting, Inc.  
11324 17<sup>th</sup> Ave Ct. NW  
Gig Harbor, WA 98332

Dear Mr. Kellogg:

Subject: Label Amendment Per PR Notices 2001-1 and other minor changes  
Sodium Cacodylate Solution  
EPA Registration No. 42519-8  
Your Submission Dated April 29, 2003

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable provided you make the following label changes.

1. The first aid statements must appear in the order of most severe routes of exposure. Therefore revise the statements so that the If Inhaled statement appears after the If Swallowed statement in the matrix.

You must submit two (2) final printed label before you release the product for shipment. A stamped copy is enclosed for your records.

Sincerely,

A handwritten signature in black ink, appearing to read "James A. Tompkins".

James A. Tompkins  
Product Manager 25  
Herbicide Branch  
Registration Division (7505C)

Enclosure

Wx

**LUXEMBOURG-PAMOL**  
**SODIUM CACODYLATE SOLUTION**  
**FOR USE IN FORMULATING OF HERBICIDES ONLY**

**ACTIVE INGREDIENTS:**

Sodium Cacodylate..... 29.0%  
Cacodylic Acid..... 5.0%

**OTHER INGREDIENTS:** ..... 66.0%

**TOTAL:**..... 100.0%

Total Arsenic (as elemental) all in water soluble form 16.3%.  
Product contains 3.25 lbs. cacodylic acid equivalent per gallon.

EPA Registration No. 42519-8  
EPA Establishment No. 42519-ISR-1

ACCEPTED  
with COMMENTS  
EPA Letter Dated  
**AUG 21 2003**

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act  
as amended, for the pesticide  
registered under EPA Reg. No.  
42519-8

**KEEP OUT OF REACH OF CHILDREN**

**CAUTION**

<b>FIRST AID</b>	
<b>If swallowed:</b>	<ul style="list-style-type: none"> <li>• Call a poison control center or doctor immediately for treatment advice.</li> <li>• Have person sip a glass of water if able to swallow.</li> <li>• Do not induce vomiting unless told to do so by a poison control center or doctor.</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul>
<b>If on skin or clothing:</b>	<ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>If in eyes:</b>	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>If inhaled:</b>	<ul style="list-style-type: none"> <li>• Move person to fresh air.</li> <li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.</li> <li>• Call a poison control center or doctor for further treatment advice.</li> </ul>
<b>HOT LINE NUMBER</b>	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-424-9300 for emergency medical information.	

**PRECAUTIONARY STATEMENTS**  
**Hazards to Humans and Domestic Animals**  
**CAUTION**

Harmful if swallowed or inhaled. Avoid breathing vapor. Avoid contact with skin, eyes, and clothing. Causes eye irritation. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

**ENVIRONMENTAL HAZARDS**

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or public waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the Environmental Protection Agency.

**STORAGE AND DISPOSAL**

Do not contaminate water, food, or feed by storage or disposal.

**PESTICIDE STORAGE:** Open dumping is prohibited. Do not store this product near fertilizers, seeds, insecticides, or fungicides. Reclose all partially used containers by thoroughly tightening screw cap. Damaged or leaking containers which cannot be used immediately should be transferred to suitable sound containers and properly marked. Absorb any spills with a suitable clay absorbant and dispose of as indicated under "Pesticide Disposal."

For safety and prevention of unauthorized use, all pesticides should be stored in locked facilities.

To prevent accidental misuse, different pesticides should be stored in separate areas with enough distance between to provide clear identification.

Opened, partially used pesticides should be stored in original labeled containers when possible. When transfer to another container is necessary because of leakage or damage, carefully mark, and identify contents of the new container.

**PESTICIDE DISPOSAL:** Pesticide wastes are toxic. Improper disposal of excess pesticide, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

**CONTAINER DISPOSAL:** Triple rinse (or equivalent), disposing of rinsate according to PESTICIDE DISPOSAL section. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

**DIRECTIONS FOR USE**

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

This pesticide may be used only for the formulation of a herbicide for use on cotton, turf or rights of way.

Formulators using this product are responsible for obtaining EPA registrations for their formulated products.

**CONDITIONS OF SALE AND WARRANTY**

Follow directions carefully. Buyer assumes all risks of storage and handling of this material not in strict accordance with directions given herewith.

In no case shall Luxembourg-Pamol, Inc. be liable for consequential, special or indirect damages resulting from the handling or storage of this product when such storage and/or handling is not in strict accordance with directions given herewith. The foregoing is a condition of sale by LUXEMBOURG-PAMOL, INC. and is accepted as such by the Buyer.

**AGRICULTURAL CHEMICAL**

**DO NOT SHIP OR STORE WITH FOODS, FEEDS, DRUGS, OR CLOTHING.**

**FOR CHEMICAL SPILL, LEAK, FIRE, OR EXPOSURE  
CALL TOLL FREE 1-800-424-9300**

NET CONTENTS:

MANUFACTURED FOR:

LUXEMBOURG-PAMOL, INC.  
5100 Poplar Avenue, Suite 2700  
Memphis, Tennessee 38137, USA

MADE BY  
LUXEMBOURG INDUSTRIES (PAMOL), LTD.

MADE IN ISRAEL

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